

ROTHMAN, SCHNEIDER, SOLOWAY & STERN, LLP

Attorneys at Law  
100 Lafayette Street, Suite 501  
New York, NY 10013

Franklin A. Rothman  
Jeremy Schneider  
Robert A. Soloway  
David Stern

Tel: (212) 571-5500  
Fax: (212) 571-5500

---

Rachel Perillo

June 5, 2020

**By ECF**

Hon. Loretta A. Preska  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: United States v. Ademola Adebogun,  
19 Cr. 291 (LAP)

Dear Judge Preska:

Robert Soloway and I are the attorneys for Ademola Adebogun, the defendant in the above-captioned matter, who is currently on pretrial release and subject to conditions that include travel restricted to the Southern and Eastern Districts of New York and the District of New Jersey. I am writing with the consent of U.S. Pretrial Services Officer Dayshawn Bostic to respectfully request a temporary modification of my client's travel restrictions to permit travel to Atlanta, Georgia from June 12 - 17, 2020 for employment purposes.

As the Court is likely aware from our previous applications, Mr. Adebogun is the owner of an entertainment and marketing company that hosts events at nightclubs and lounges. His company has not held any events since the COVID-19 pandemic began in March 2020. Now, as states slowly begin reopening businesses, Mr. Adebogun has the opportunity to personally host an event through his company on June 13, 2020 in Atlanta, Georgia, which officially opened its bars and restaurants on June 1, 2020. (Notably, Mr. Adebogun traveled to Atlanta around the same time last year, with the Court's permission, to host a similar event. See ECF Doc. 73). In order for the event to proceed, Mr. Adebogun's presence is required. He therefore

Hon. Loretta A. Preska  
June 5, 2020  
Page Two

respectfully requests permission to travel to Atlanta, Georgia for the purpose of this employment opportunity.

If the Court approves, Mr. Adebogun would fly to Atlanta on June 12, 2020 and return to New York City on June 17, 2020. He will be staying with his cousin, Lukmon Ajose and his cousin's wife, Kelly Ajose at their home in Atlanta, the address of which has been provided to Pretrial Services. Pretrial will also receive a copy of Mr. Adebogun's flight information once the flights are booked. As previously mentioned, Pretrial Services Officer Dayshawn Bostic consents to this request. The government, by AUSA Daniel Wolf, defers to the position of pretrial.

Accordingly, it is respectfully requested that Mr. Adebogun be permitted to travel to Atlanta, Georgia from June 12 - June 17, 2020 for employment purposes.

If the Court has any questions regarding this application please contact my office.

Thank you for your attention to this matter.

Respectfully submitted,

/s/

Rachel Perillo

cc: Rebecca Dell (by ECF)  
Daniel Wolf (by ECF)  
*Assistant United States Attorneys*

Dayshawn Bostic (by Email)  
*U.S. Pretrial Services Officer*

Travel as outlined in counsel's letter  
is approved.

SO ORDERED.

Dated: June 8, 2020

---

LORETTA A. PRESKA, U.S.D.J.